



MINUTES

5 March 2014
Miranda, NSW

Chair	Keith Baldry (SA)
Members	Ross Bevan (ACT), Brad Cassells (VIC), Simon Critchley (QLD), Roslyn Drummond (other member), Peter Karamoskos (person representing public interests), Andrew Kerans (other member), Carl-Magnus Larsson (ARPANSA), Robert Lyon (NSC representative), Len Potapof (NSW), Russell Robinson (NT), Barbara Shields (TAS)
Secretary	Peter Colgan assisted by Diane Harrison, Alex Kalaiziovski and Selva Kumar
Apologies	Hazel Upton (WA)
Observers	Martin Dwyer, Peter Johnston, Stephen Solomon, Mary Aerts (WA)

1. STANDING ITEMS

Item 1.1 Welcome & apologies

Chair

The meeting opened at 0935. The Chair welcomed those present and noted the apologies.

Professor Ray Kemp, the new chair of the Radiation Health and Safety Advisory Council (RHSAC), joined the meeting via phone link from the UK to introduce himself to the Committee.

Professor Kemp said it will be important to have a closer working relationship between Council and the RHC. He intends that transparency and communication will be a focus for the Council and that miscommunication in radiation protection can have serious consequences.

Professor Kemp spoke to Information Item 3.1 and remained on the line for discussion of Item 2.1.

Item 1.2 Previous minutes & web summary

Chair

The minutes from the previous meeting on 13 November 2013 were confirmed out of session. There was no further comment on the minutes or the web summary.

Item 1.3 Business arising from previous minutes & Action List

Chair

The Chair observed that most items in the action list are included for discussion in the agenda, or either completed (action items 3 and 4) or ongoing (action items 8 and 9).

Action Item 7 PRMS - the Committee was advised that regulators had provided the working group with the contact details of approved PRMS providers.

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Action Item 11 Meeting dates – the Committee was provided the list of meeting dates for 2014 and requested to provide feedback as appropriate.

Action Item 12 NDRP amendment on incident reporting - the Committee was briefed that the working group had worked out a way forward for continued work on the project.

Action Item 13 Review of RHC Statements - the Chair suggested that the review of RHC Statements should be rolled into the work underway on RPS Mapping and any subsequent review of the RHC's Work Program and Priorities.

Item 1.4 Correspondence

Chair

The Committee noted correspondence with the Queensland Radiation Advisory Council regarding the RHC Statement on *Safe Handling of Deceased Persons Recently Treated with Radioactive Material*.

The Committee discussed the circumstances and noted that further data on adverse outcomes had been requested – it was possible that incidents were isolated to one particular practice. The review of RHC Statements that is part of current Committee work on the Radiation Protection Series mapping will include this statement, and that unless further evidence is received the Committee agreed that no further action on this matter would be required.

2. ITEMS FOR DISCUSSION & DECISION

Item 2.1 Advisory Bodies – Roles & Expectations

Carl-Magnus Larsson

Dr Larsson introduced a discussion paper on interactions between ARPANSA and the advisory bodies, previously considered by the RHSAC and the Nuclear Safety Committee. He stressed that a primary function of the RHC is to promote national uniformity; therefore members must be committed to this cause and have the authority to make decisions that support it. Dr Larsson advised that this paper was part of his efforts to revitalise the Committees and Council.

The need for increased and broader public interaction was discussed and the Committee agreed that any advice or comments from the public should be prominent in the agenda. Members agreed that this will become standing agenda item 1.5.

The Committee endorsed the CEO's paper which will now be formalised as a guidance document in ARPANSA's Quality Management System.

The current membership term will end in December 2014; nominations will be sought mid-year and the discussion paper will form the basis of the RHC terms of reference.

On National Uniformity, Dr Larsson stated it was incumbent on RHC Members to improve national uniformity at the State level, with ARPANSA's role to influence and promote, and provide guidance.

2.2a RPS Mapping

The Committee noted progress on the mapping of the Radiation Protection Series documents against relevant international publications, particularly in the area of planned exposure situations. Gaps were noted in the areas of regulatory infrastructure, management systems, existing exposure situations and emergency exposure situations. The Committee agreed that the mapping exercise, and the identified gaps, should form the basis of the future work program of the RHC.

It was proposed that IAEA documents be adopted wherever possible and given an Australian context as necessary. The Committee agreed that the RPS documents should, over time, grow to reflect the 13 areas corresponding to the IAEA framework and hierarchy. At the level of guides, minimal changes would be required to some IAEA documents for adoption as RPS documents, and existing state and territory guidance may also be appropriate to adopt. For the higher level Codes of Practice, the adoption of the related IAEA Requirements documents would require the usual regulatory impact processes and likely clarification or modification to align with Australian regulatory systems. .

Dr Karamoskos, who represents the interests of the general public, expressed the opinion that the public is likely (in general) to support the adoption of IAEA documents as international best practice.

The Committee agreed that better engagement with the IAEA is needed to understand and influence the development of documents. Dr Larsson suggested that with the contribution of all jurisdictions through the work of the Committee, Australia could more effectively engage with the international community. More active management of a national response through the Committee and better feedback from ARPANSA representatives on international committees are both required. Reporting on the pipeline of IAEA drafts would be useful to keep the Committee informed.

The Committee endorsed the process of 'in principle' adoption of IAEA publications as RPS documents, subject to OBPR and legislative requirements.

2.2b NDRP Status Report

The Committee noted the recent publication of NDRP Amendment 6.

The Committee also noted that as it is directed to regulators, the NDRP should not be a document in the Radiation Protection Series. Members further noted that aspects of the NDRP were akin to the IAEA's Governmental, Legal and Regulatory Framework for Safety, GSR Part 1, and these aspects of the NDRP should form the basis of a new RPS document reflecting GSR Part 1.

It is important that the valuable functions of the NDRP are not lost, and it could be retained as a repository of things agreed by the Committee, but outside the Radiation Protection Series of documents.

The Committee noted the 2008 *'Review of the Efficiency and Effectiveness of the National Directory for Radiation Protection- Edition 1 (NDRP)'*. Members agreed that national uniformity has not been fully achieved in implementation.

Agenda Item 2.6 was discussed as an example of the perception of non-uniformity to some radiation users that work across state borders.

The Committee considered the Australian Government's current deregulation agenda and its possible ramifications on the NDRP and future amendments. A deregulation agenda presents an opportunity for better regulation, as well as the RHSAC's 2008 advice that the NDRP model be reviewed. Members discussed the relevance of the current NDRP and various options for its future including a single national law with continued enforcement by the Commonwealth, states and territories within each jurisdiction.

It was acknowledged that national legislation or nationally consistent legislation would contribute to nationally uniform outcomes and hence further deregulation objectives.

The majority of members indicated their support for uniform legislation. This and the future of the NDRP will be further considered at the next meeting.

ACTION 1: Prepare and circulate a discussion paper on the long term vision for national uniformity before the June meeting [CML, KB & BC]

2.2c RHC Working Group Composition, Procedures & 21 Step Management Process

The Committee approved the following proposals for the development and implementation of a project management strategy for RHC Working Groups to be included in the ARPANSA quality management system:

- The Project Manager for the Working Group will be the nominated RHC member, as agreed by the voting members present at the meeting where the decision to form the Working Group was taken.
- The membership of any Working Group formed to resolve a radiation protection issue will be formally approved by the Committee.
- The Committee will nominate a Technical Support Officer as secretary to the Working Group either from APRANSA staff with relevant scientific, technical, policy and/or legal expertise (subject to the approval of the CEO of ARPANSA), or another relevant expert from the organisations of other members (with appropriate approval of the relevant member or organisation).
- The work plan for all radiation protection issues being resolved via a RHC established Working Group, will follow the approved template that allows tracking of progress, flexibility for the differing options as they develop, and contains milestones and project deadlines.
- The work plan will be submitted by the Project Manager for Committee approval (for straightforward plans this approval may be given by the Chair and the approved work plan submitted for the information of Members). Additionally the Project Manager will, at each meeting following the establishment of the Working Group and until the radiation protection issue is resolved, provide a written and/or verbal report on progress against the agreed work plan.

ACTION 2: All working groups on RHC Projects to implement the 21 Step Workplan [Project Managers]

ACTION 3: To incorporate the RHC Working Group Composition, Procedures and 21 Step Workplan into ARPANSA's Quality Management System [ARPANSA (NU)]

ACTION 4: RHC Project Managers to provide progress reports against the approved Workplan at all future Committee meetings [Members]

2.2d Progress report on current projects

The Committee discussed the status of the Planned Exposure Code noting that comments on the current draft were received from four jurisdictions including ARPANSA. The document now needs to be progressed to the next stage by a Working Group. The Chair stressed the importance of agreement by all jurisdictions on this key document and it was agreed that the Committee in toto would form the working group on this important publication and review the modified document.

The Committee noted that an additional consultation process will be required on the ELF Guide to meet the OBPR requirements, and an updated PDP and Workplan would be provided.

ACTION 5: Latest version of Planned Exposure Code, with marked up comments, to be circulated to all RHC members for comments resolution [KB]

ACTION 6: RHC Members to resolve comments on draft Planned Exposure Code, via teleconference if necessary [Members, ARPANSA (RHS)]

ACTION 7: New Workplan and PDP to be instigated to progress the ELF Guide [ARPANSA (RHS)]

Item 2.3 Proposed NDRP amendment – Disposal of Radioactive Material

Barbara Shields
Keith Dessent

The Committee noted the changes to the draft NDRP entry and schedule from the version presented at the November 2013 RHC meeting, in particular the introduction and use of a third methodology for calculating the exposure of people from disposals to sewer and to atmosphere. The Committee considered the comparison tables that indicate the range of values generated by the various methodologies and from which the values in Table S14.1 were selected. Much of the information text in the paper and attachments presented at the November meeting has been collated into an annex.

As an NDRP entry, the document is directed at regulators not users. The Committee agreed that paragraph 4.2 of the document should be amended to direct the requirements to regulators.

The members present voted unanimously in favour of the NDRP amendment progressing to the next step in the 21 Step Workplan subject to the amendments discussed and agreed to by the Committee.

ACTION 8: Amend paragraph 4.2 of the NDRP entry to direct the requirements to regulators as discussed and agreed to by the Committee [BS]

ACTION 9: Progress the NDRP entry through step 6 of the 21 Step Workplan process [WG]

Safety Guide for Radiation Protection of the Environment

Item 2.4

Brad Cassels
Marcus Grzechnik

The Committee praised the working group for the quality of the draft safety guide and approved its progress to the next stage. The Committee requested the draft be sent as a courtesy to the RHSAC.

ACTION 10: Send draft safety guide to RHSAC [WG]

ACTION 11: Undergo step 6 of the 21 Step Workplan [WG]

Note: subsequent actions are dependent on advice from OBPR

Item 2.5 Clearance & Closure criteriaKeith Baldry
Daniel Bellefemine

The Committee noted the current status of the project and the following recent changes to the Working Group:

Mr Duncan Surin from the WA Department of Health has joined the working group

Mr Matthew Newton has replaced Mr Michael McFadyen in his role as NSW Mining regulator

A clear regime for moving between exposure situations was recommended to ensure that planned exposure situations do not turn into existing or emergency situations.

The Committee heard that the Working Group is planning to consider how radiological contamination criteria can be built into the National Environmental Protection (Assessment of Site Contamination) Measure (NEPM). However, in light of the discussion under Item 2.2b, the Working Group should now consider how the relevant IAEA publications can be incorporated or adopted (including Safety Guide 'Release of Sites from Regulatory Control on Termination of Practices' WS-G-5.1).

ACTION 12: The proposal for the future of this project to be tabled at the June meeting [WG]

Item 2.6 Duplication of authorisations for vessels operating in Australian waters

Alex Kalaiziovski

The Committee considered the matters raised by the Dutch dredging company Van Oord. Members discussed 'law of the sea' issues but concluded that this is basically a mutual recognition issue with wider implications for other stakeholders that also operate across state borders.

Members agreed that there is no escaping the fact that a licence is required in each jurisdiction. However, for operators undertaking the same dealing in multiple jurisdictions, there should be a reasonable expectation that a licence issued by one state/territory regulator will be recognised by another without additional requirements other than a licence application and fee.

While there was a commitment to minimising regulatory burden, the Committee deemed that there was insufficient detail to determine where and what unnecessary bureaucracy and delays may have been encountered. Further information is to be sought on such red tape. The Van Oord experience will be used as a case study on uniform regulatory outcomes. The Chair undertook to develop a 'Regulatory Expectations' document, for the agreement of regulators, on how operators can expect their applications for authorisations (licences/registrations) and approvals of radiation management plans will be dealt with between jurisdictions.

ACTION 13: Request further details from Van Oord including information regarding delays, costs and additional requirements [KB, ARPANSA (NU)]

ACTION 14: Prepare and circulate a draft Regulatory Expectations document detailing what can be expected from radiation regulators for users operating in multiple jurisdictions [KB]

Item 2.7 (3.10) IAEA draft guide on Occupational Radiation Protection – request for comment

The Committee noted this important document. It is possible that this Safety Guide might be adopted in part/s or in full as a guide in the RPS series supporting the Planned Exposure Code. Attention of members was directed particularly to Chapter 7 Personal Radiation Monitoring Services and its relevance to the current RHC project.

Members were asked to provide comment on the draft within six weeks. An extension to the IAEA's June deadline will be sought so that a consolidated national response can be considered at the June RHC meeting.

ACTION 15: Comment on IAEA draft guide DS453 by 30 April 2014 [Members]

ACTION 16: Coordinate comments and prepare national response for June meeting [ARPANSA (NU)]

NOTE: The comment period on this working draft has closed. A draft for member comment is expected later this year.

3. INFORMATION ITEMS

Item 3.1 RHSAC & NSC Reports Ray Kemp; Bob Lyon

The Committee noted the summary report of the November 2013 RHSAC meeting. Mr Lyon presented a summary of the NSC meeting held in Sydney on 28 February 2014.

Item 3.2 International Liaison

The Committee noted a report on the IAEA Waste Safety Standards Committee (WASSC36) meeting in November 2013.

Item 3.3 Japanese report of incorrect delivery of cancer treatment

The Committee discussed the Japanese report and considered it unlikely that similar events could occur in Australia but that individuals subverting safety procedures can always introduce a risk of incidents.

Item 3.4 Proposed ban on commercial solarium

Correspondence from the Australian Competition & Consumer Commission (ACCC) was noted. Members confirmed that their respective jurisdictions are already moving towards a ban on commercial solarium. The ban is not expected to extend to domestic solarium.

ACTION 17: Respond to the ACCC [ARPANSA (NU)]

Item 3.5 Revised Eye Dose

The Committee noted IAEA Tecdoc No 1731 *Implications for Occupational Radiation Protection of the New Dose Limit for the Lens of the Eye* published in December 2013.

Item 3.6 Uranium exploration

The Committee noted correspondence between ARPANSA and NSW Trade & Investment suggesting revisions to RPS 9 and RPS 15 to cover uranium exploration and offering assistance.

It was agreed that any review of RPS 9 and RPS 15 would be considered in conjunction with work underway on RPS Mapping and any subsequent review of the RHC's Work Program and Priorities. NSW and other uranium exploration and mining jurisdictions would be included in such a review.

ACTION 18: Respond to NSW Trade & Investment [ARPANSA (NU)]

Item 3.7 Published RPS documents

The Committee noted the recent publication of the *Fundamentals for Radiation Protection* RPS F-1 and Amendment No 6 of the NDRP.

It was noted that 'safety culture' is not defined in the Fundamentals (and should be at the next update).

Item 3.8 IAEA draft guide on Communication & Consultation

The Committee noted IAEA draft guide DS460 *Communication and Consultation with Interested Parties by the Regulatory Body*. ARPANSA will coordinate a national response. Comments requested within six weeks.

ACTION 19: Provide comment on DS460 by 30 April 2014 [Members]

Item 3.9 RF Research Report

The Committee noted the draft report and acknowledged the contribution of the experts who worked on it.

The report concludes that RPS3 continues to provide an adequate level of protection to the public however the quantum of the safety factor has been reduced on the basis of improved knowledge. A proposal to revise RPS3 will be put to the next meeting. The Committee requested that, given his expertise in the area, Dr Andrew Kerans be approached to undertake the role of project manager for the revision project.

This subject is of significant public interest and explanatory material will be released with the RF Research Report later in March.

ACTION 20: Approach Dr Kerans to undertake the role of Project Manager for the revision of RPS3 [KB/ARPANSA (NU)]

ACTION 21: Prepare PDP including a 21 Step Workplan for revision of RPS3 for June meeting [ARPANSA (RHS)]

Item 3.10 (See Item 2.7)

4. OTHER BUSINESS

Joint Convention

ARPANSA will shortly write to all jurisdictions to provide their current waste inventory to ARPANSA to assist in the national reporting requirements under the Joint Convention.

Australian Clinical Dosimetry Service (ACDS)

The Committee noted the ACDS workshop being held on 6 March 2014.

Close	1600
Next meeting	0930, 25 June 2014, ARPANSA Miranda Office

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